

May 22, 2001

MEMORANDUM TO: William Beckner, Acting Chief
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Reactor Program Management, NRR

FROM: Joseph L. Birmingham, Project Manager/**RA**/
Generic Issues, Environmental, Financial &
Rulemaking Branch
Division of Reactor Program Management, NRR

SUBJECT: SUMMARY OF April 24, 2001 PUBLIC MEETING WITH THE NUCLEAR
ENERGY INSTITUTE (NEI) ON ALARA ASSESSMENT IN THE
OCCUPATIONAL RADIATION SAFETY AREA

On April 24, 2001, Nuclear Regulatory Commission (NRC) staff met with a representative of NEI to discuss ongoing implementation of the Significance Determination Process (SDP) in the radiation protection area and alternative approaches to assess the performance of licensee programs to maintain occupational exposures as-low-as-reasonably-achievable (ALARA). A list of those attending the meeting is attached. This was the first in a series of public meetings planned to incorporate the outcome of the Reactor Oversight Implementation (ROP) Lessons Learned Workshop (LLW) held on March 26 through 28, in Gaithersburg, Maryland.

The meeting began with a review of the issues and proposed alternative courses of resolution arrived at during the LLW. Roger Pedersen, NRC, opened the discussion with a question concerning the basis for the industry's objection to the staff's proposal to use a licensee's rolling three-year average (RTYA) collective dose as a GREEN logic gate in the SDP. Ralph Andersen, NEI, indicated that it was an issue of fairness. The industry participants at the LLW believe that the NRC's intended use of the RTYA implied not only that a licensee below the screening criteria was doing something right but that a licensee above the criteria must be doing something wrong. The licensees believe that the RTYA is not a good indication of performance when used out of context. The licensees also believe that an ALARA inspection finding should start with a finding of a failure of the ALARA program.

A number of issues and resolutions that received strong alignment at the LLW were reviewed. These included:

- 1) The wording of the Occupational Radiation Safety Cornerstone Objective in the ROP documentation should be revised to clearly reflect the programmatic nature of the regulatory requirement.
- 2) The SDP should be revised to clearly reflect the Commission Policy on shallow dose exposures from hot particles (also known as discrete radioactive particles).
- 3) That a single ALARA program failure should not result in a degraded cornerstone; therefore, the YELLOW decision gate and outcome should be removed from the SDP.

The following points regarding the proposed alternate basis for ALARA performance assessment were discussed:

- 1) Replace the ALARA Group 2 screening question in MC-0610 with one that clarifies that the basis for a finding is based on a program failure and results in unintended collective dose. What is meant by unintended collective dose needs clarification.
- 2) Use the RTYA collective dose (currently part of the Group 2 question) as a basis for setting the level of effort for the baseline inspection program (BIP) (IP-71121 Att. 2). The time period for averaging the collective dose is still under discussion.
- 3) Use the dose criteria in the current Group 2 question as inspection guidance (in IP 71121) to clarify what a "minor issue" (as used in the Group 1 questions) is for ALARA.
- 4) Basis for a White finding needs further discussion.

Ralph Andersen expressed the belief that the current level of effort for ALARA program review in the BIP is excessive. He stated that industry feels the majority of the industry is implementing an effective ALARA program. In accordance with the spirit of the NRC's strategic goal to improve effectiveness and efficiency, the industry wants to help the NRC confirm the effectiveness of licensee's ALARA programs with a minimum of inspection effort.

Roger Pedersen agreed that the inspection effort for ALARA in the first year of implementation was more than necessary for many licensees and indicated that a review and adjustment to the BIP hours was underway as a separate lessons learned activity. However, he noted that the current effort to revise the basis for an ALARA inspection finding has introduced considerable uncertainty into the analysis of the BIP hours needed for ALARA inspections.

Roger Pedersen stated that maintaining safety was an NRC strategic goal. He indicated that there is a need for an ALARA assessment process that will detect and respond to any reversals of the outstanding improvements in ALARA performance made by the industry in the last decade.

The meeting concluded by reviewing action items for the next meeting on May 9, 2001. The NRC and NEI participants agreed to each bring a draft (strawman) Group 2 question to use as a starting point to define an appropriate basis for an ALARA finding. The NRC agreed to review the ROP documents that discuss the cornerstone objectives. NEI agreed to bring three or four sets of ALARA implementing procedures to aid in discussing what makes up unintended collective dose.

Having completed discussion of the agenda items, the meeting was adjourned.

Project No. 689
Attachment: As stated
cc w/atts: See list

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Project No. 689

Attachment: As stated

cc w/atts: See list

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**List of Attendees for April 24, 2001 Meeting
Radiation Safety Cornerstone - ALARA Assessment**

NAME	ORGANIZATION
Ralph Andersen	NEI
Jim Wigginton	NRC/NRR/IOLB
Roger Pedersen	NRC/NRR/IOLB
Kathy Halvey Gibson	NRC/NRR/IOLB
Deann Raleigh	SCIENTEC
Harriet Karagiannis	NRC/RES/DRAA